

May 30, 2017

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Comments of Windy City Broadcasting, LLC in RM-11787

Dear Ms. Dortch:

Windy City Broadcasting, LLC ("Windy City"), pursuant to Public Notice Report No. 3076 (released April 27, 2017), hereby submits these comments on the rule making proposal filed by the National Association of Broadcasters ("NAB").

Windy supports NAB's petition for rule making. The Commission must expand the possible technical solutions available to FM translator stations when resolving interference complaints, including but not limited to filing displacement applications.

FM translator stations are a secondary service that traditionally provided fill-in service for commercial FM radio stations to overcome shadowing or terrain obstruction. Translator stations could not rebroadcast an AM station. In 2009 the Commission changed its rules to allow translator stations to rebroadcast an AM station.

AM stations have benefitted tremendously from this change. Daytime AM stations and AM stations forced to reduce power or cease operations after sunset provide improved services to their listeners via an FM translator. Daytime AM stations can now provide traffic, weather and local news to their audience during morning and afternoon drive time. Daytime stations and stations operating with reduced power after sunset can expand upon local programming for events occurring after sunset, such as town council meetings, high school sporting events and emergency information. Translator stations provide fill-in service for AM stations where coverage may be inconsistent.

The use of translator stations to rebroadcast AM radio stations has increased significantly over the past seven years. Last year alone the Commission granted more than 1,000 construction permit applications for translator stations to move up to 250 miles in an effort to pair translator stations with AM stations. The majority of these applications relocated translator stations from rural to urban markets where AM stations desperately needed the translator stations. Expectations are that a similar demand for translator stations will manifest itself when the Commission opens two filing windows for new FM translator stations to rebroadcast AM stations.

Commission approval of construction permits for FM translator stations to rebroadcast AM stations while helpful is not enough. A construction permit is of no use if the translator station is unable to remain on the air because of interference complaints. The Commission needs to revise its procedures to allow broadcasters every technical solution possible to resolve the problem.

Windy City is the licensee of FM translator station K244EX, licensed to Las Vegas, Nevada. K244EX rebroadcasts the signal of AM radio broadcast station KKVV, Las Vegas, Nevada. On December 2, 2016, Windy City filed its application for modification of construction permit for K244EX. On December 13, 2016, the Commission granted the permit application. On December 14, 2016, Windy City filed its application for covering license.

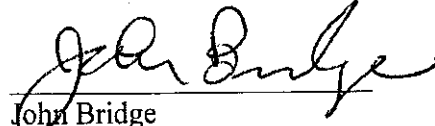
Farmworker Educational Radio Network, Inc. ("Farmworker") is the licensee of FM radio broadcast station KYLI(FM), Bunkerville, Nevada. On December 13, 2016, Farmworker filed an Informal Objection against the permit and license applications. On March 31, 2017, the Commission staff dismissed the Informal Objection. However, the Commission reminded the parties that in the event K244EX caused any actual interference to the over the air reception of KYLI, Windy City must resolve any interference complaints pursuant to Section 74.1203 of the Commission's Rules.

Complaints of predicted interference during the application phase or actual interference after the translator station commences operations can be remedied far easier if the Commission were to make available to translator stations all technical solutions to resolve the problem. At a minimum, the translator station should be allowed to file a displacement application specifying a different frequency, even if the frequency would otherwise constitute a major change. Presently the Commission allows a translator station to file a displacement application only if displacement occurs because of action on the part of the full power station. The Commission should allow the translator station to file a displacement application regardless of whether the translator station or the full power station filed the permit application leading to the predicted or actual interference. The Commission should also consider whether other technical solutions that otherwise would constitute a major change should be allowed to resolve the potential problem.

Making available a wide range of technical solutions for resolution of interference complaints for translator stations during the application process or when the translator station is broadcasting will serve the public by ensuring that more translator stations remain on the air. The public interest is further served because technical solutions will conserve the resources of the Commission and the public.

Respectfully Submitted,

WINDY CITY BROADCASTING. LLC

A handwritten signature in cursive script, appearing to read "John Bridge", written over a horizontal line.

John Bridge
Member